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VIA ECF

Honorable Edgardo Ramos
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *Ithaca Capital Investments I, S.A., et al. v. Trump Panama Hotel Management LLC, et al.*, No. 18 Civ. 390 (ER) – Request for Adjournment of Conference

Dear Judge Ramos:

Pursuant to Section 1(E) of Your Honor's Individual Practices, the Parties jointly seek an adjournment of the pre-motion conference set for October 10, 2019 at 12:00 p.m.

After conferring with Ms. Rivera today, October 9, 2019, and based upon the Parties' representation to Ms. Rivera that they have mutually agreed to stay this proceeding for a period of three (3) months due to an agreement stemming from the pending related ICC Arbitration between these and related parties, the Parties jointly seek an adjournment of tomorrow's pre-motion conference. Ms. Rivera recommended that the Parties file a letter motion regarding the request for a stay and, due to the scheduled pre-motion conference tomorrow, to also file an expedited letter requesting that the pre-motion conference be adjourned pending resolution of the request for a stay. The Parties are working on the letter motion for a stay and will be submitting that as soon as possible, but meanwhile seek to have the pre-motion conference adjourned.

Therefore, having conferred, the Parties jointly make this request for the pre-motion conference, set for October 10, 2019, to be rescheduled for a date to be determined after the request for a stay is resolved. Alternatively, if preferred, the Parties can appear tomorrow for the purpose of discussing their upcoming request for a stay, rather than the pending discovery issues.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ *Darryl R. Graham*

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